

EXHIBIT D

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

This Document Relates to:

ALL MATTERS

Case No. 3:23-md-03084-CRB (LJC)

**DECLARATION OF VERONICA HAYES
GROMADA IN SUPPORT OF DEFENDANTS'
POSITION IN THE JOINT LETTER
REGARDING INTERROGATORY NO. 8**

Judge: Hon. Lisa J. Cisneros
Courtroom: G - 15th Floor

1 I, Veronica Hayes Gromada, declare:

2 1. I am an attorney in the law firm of Shook, Hardy & Bacon, L.L.P. I am a member
3 of the State Bars of Texas and Washington, D.C. and am admitted to practice pro hac vice before
4 this Court. I make this declaration based on my own personal knowledge. If called upon to testify, I
5 could and would testify competently to the truth of the matters stated herein.

6 2. Attached as **Exhibit 1** is a true and correct copy of a May 28, 2025 letter by Dr.
7 Indira Henard, a member of the UBER Safety Advisory Board.

8 I declare under penalty of perjury that the foregoing is true and correct.

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10 Executed this 28th day of May, 2025 in Houston, Texas.

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12 /s/ Veronica Hayes Gromada
13 Veronica Hayes Gromada
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EXHIBIT 1

May 28, 2025

Dear Magistrate Judge Lisa J. Cisneros,

My name is Dr. Indira Henard, and I am a current member of the UBER Safety Advisory Board, which I have been apart of for four years. I am also President and CEO of the DC Rape Crisis Center, which is the oldest rape crisis center in the country. I have been at the DC Rape Crisis Center for seventeen years, and I am award winning , whose has been providing dedicated service to to the violence against women movement for over twenty five years. I am recognized, nationally and internationally in helping organizations build capacity to respond to the needs of sexual assault survivors in their communities. I am writing to you to convey the importance of upholding, and protecting the privacy, and confidentiality of survivors of sexual assault.

Sexual assault is a profoundly traumatic experience that can have lasting psychological, emotional, and physical impacts on survivors of sexual assault. When someone chooses to come forward and report a sexual assault, it is an act of immense courage, often accompanied by vulnerability and fear. One of the most critical elements in supporting survivors is maintaining strict privacy, and confidentiality. Confidentiality not only protects the survivor's privacy, but it also fosters a safe environment where they can begin to heal, and assert control over their story.

Furthermore, when a survivor of sexual assault reports abuse, they often share deeply personal and intimate details. Knowing that these details, and their anonymity will remain private can help alleviate fears about being judged, ostracized, or re-traumatized by public exposure. For many, confidentiality, and survivor privacy is is a fundamental necessity that allows survivors of sexual assault create a path to healing.

This is important because survivors of sexual assault often struggle with shame, guilt, anxiety, and post-traumatic stress disorder (PTSD). The prospect of having their experience exposed publicly can significantly exacerbate these feelings, potentially deterring them from seeking support or other remedies.

Survivor privacy, and confidentiality provides a protective barrier, enabling survivors of sexual assault to engage with support, and services without fear of retribution or public shaming. If survivors of sexual assault privacy, and confidentiality is not protected to include contact information. It could cause irreversible harm emotionally, and psychologically.

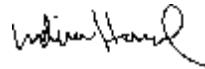
To that end, survivors of sexual assault are often at risk of retaliation from perpetrators, institutions, or even their own communities. Upholding survivor privacy, and confidentiality can help shield them from potential backlash, harassment, or further emotional trauma. It also reduces the likelihood of sexual assault survivors being "outed" without their consent,

particularly in sensitive cases involving minors, LGBTQ+ individuals, or other individuals from marginalized groups.

Survivors of sexual assault should always have control over how their stories are shared, and their autonomy should be respected, and protected. This is a choice that must remain entirely theirs to make, without interference from outside institutions. By doing this, you are not only creating a bedrock of compassion, and respect, but you are centering humanity that allows survivors of sexual assault to reclaim their power, and regain agency over their lives, to include access support.

There are no words to adequately describe what it means when you become a victim of sexual assault, and being able to come on the other side of that , and strive for healing, and wellness is rooted in survivors of sexual assault being able to have their privacy as a sexual assault survivor protected, and upheld at the highest level.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Indira Henard", written in a cursive style.

Dr. Indira Henard

UBER

Safety Advisory Board Member